

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## UNITED STATES DISTRICT COURT

United States Courts  
Southern District of Texas  
FILED

for the

MAR 24 2025

District of \_\_\_\_\_

Nathan Ochsner, Clerk of Court

Division \_\_\_\_\_

Case No.

25 CV 1344

(to be filled in by the Clerk's Office)

STEVEN LOUIS MASSEY JR

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

LUNIEA LAW OFFICES  
MONTGOMERY COUNTY  
MONTGOMERY COUNTY SHERIFF'S OFFICE  
WALKER COUNTY  
TEXAS DEPARTMENT OF CRIMINAL JUSTICE

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☐ No

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

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**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name STEVEN LOUIS MASSEY JR.  
 Address 13289 PECAN TREE DR  
WILLIS TEXAS 77318  
City State Zip Code  
 County MONTGOMERY  
 Telephone Number 936-380-2757  
 E-Mail Address tigermassey1@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name ZUNIGA LAW OFFICE'S  
 Job or Title (if known) LAWYER  
 Address 6200 SAVOY SUITE 630  
HOUSTON TEXAS 77036  
City State Zip Code  
 County HARRIS COUNTY  
 Telephone Number 713-378-4529  
 E-Mail Address (if known) VZUNIGA@ZUNIGA-LIVE-WEBSITE.COM  
☐ Individual capacity ☒ Official capacity

**Defendant No. 2**

Name MONTGOMERY COUNTY  
 Job or Title (if known) MAYOR DUKE W. COON  
 Address P.O. BOX 3066  
CONROE TEXAS 77305  
City State Zip Code  
 County MONTGOMERY  
 Telephone Number 936-522-3010  
 E-Mail Address (if known) N/A  
☐ Individual capacity ☒ Official capacity

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## Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

MONTGOMERY COUNTY SHERIFF'S OFFICE

WESLEY DOOLITTLE

#1 CRIMINAL JUSTICE DR

CONROE

City

TEXAS

State

77301

Zip Code

MONTGOMERY

936-760-5800

N/A

☐ Individual capacity ☒ Official capacity

## Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

WALKER COUNTY

RUSSEL HUMPHREY

1220 11TH STREET

HUNTSVILLE

City

TEXAS

State

77340

Zip Code

WALKER

936-291-5413

N/A

☐ Individual capacity ☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☒ Federal officials (a *Bivens* claim)☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

SEE ATTACHMENT II.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

SEE ATTACHMENT II.

*ATTACHMENT-B.*

Defendant No. 5

Name Texas Department of Criminal Justice

Job or Title Bryan Collier

Address 209 West 14<sup>th</sup> Street 5<sup>th</sup> floor

Price Daniel Building

Austin Tx 78701

County Travis

Phone number: 512-463-8988

individual capacity      Official capacity

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur? *ON PUBLIC RECORD  
AROUND 1-22-2025*
- B. What date and approximate time did the events giving rise to your claim(s) occur?  
*SEE ALL LAW SUITES AND NEWLY DISCOVERED EVIDENCE*
- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)  
*SEE EXHIBITS IN EACH LAW SUIT*

~~ATTACHMENT - II~~

Assert violations of the amendments of the United States constitution.

1. The 1st Amendment is about Freedom of speech. The notion that the government will not interfere with the ability of the people, the press, or religious groups to express their views or to protest in favor of them.
2. The 4th Amendment is about the right of the people of the United States to feel secure in their homes and possessions without fear of "unreasonable searches and seizures." This relates to modern law concerning the need for a warrant to search property.
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4. The 5th Amendment is commonly known as the double jeopardy law. Those tried and acquitted for a crime cannot be tried again for that same crime. Also, the accused cannot be asked to be a witness against themselves.
5. The 6th Amendment is about the right of all citizens of the United States to a speedy and fair public trial. This also means an impartial jury and the right to a defense counsel and witnesses in their favor. It also infers the concept of the assumption of innocence until proven guilty.
6. The 8th Amendment is a ban on extreme punishments for crimes, focusing on those that are "cruel and unusual" and on excessive fines or bail.
7. The 14th Amendment is the assertion that all those born or naturalized within the United States are citizens of the United States. Furthermore, the promise that no state will

enforce any law that will damage these privileges in any way. This is also known as the Equal Protection Clause and was ratified on July 9, 1868

ATTACHMENT *II*.

CLAIM : 1

ZUNIGA LAW OFFICE'S : Legal Malpractice , Breach of Legal Duty , Breach of Contract , Client-Relationship , Failure To Investigate , Actual Conflict Of Interest ...

CLAIM : 2

MONTGOMERY COUNTY SHERIFF'S DEPARTMENT : Procedures Of Search Warrant , Defamation Of Character , Fabrication Of Police Report , Fabrication Of Evidence ...

CLAIM : 3

MONTGOMERY COUNTY : Defamation Of Character , Prosector – Misconduct , Wrongful Imprisonment ....

CLAIM : 4

WALKER COUNTY : Defamation Of Character ....

CLIAM : 5

TEXAS DEPARTMENT OF CRIMINIAL JUSTICE : Wrongful Imprisonment , Defamation Of Character ...



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**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

7-YEAR WRONGFULLY CONVICTED

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

SEE ATTACHMENT V. RELIEF

## ATTACHMENT V. RELIEF

MR. MASSEY IS ASKING COURTS TO DO

MR. Massey Prays Courts Will Sign Off on All ORDERS Below:

ORDER: 1

MR. MASSEY REQUEST a full federal investigation on all parties involved: Lawyers, District Attorneys, Judges, State Bar of Texas, and Police Officers agencies in MONTGOMERY COUNTY AND WALKER COUNTY

ORDER: 2

MR. MASSEY REQUEST courts to change his name from: STEVEN LOUIS MASSEY JR.

TO: BILL MASSEY; Nobody should ever have to go through what MR. MASSEY has been though over mix up of fathers charges

ORDER: 3

MR. MASSEY REQUEST to reverse MR. MASSEY'S 18 year sentence do to unbelievable amount of evidence hidden for (7) seven years [ 1<sup>st</sup> wrong house or robbery ] [ 2<sup>nd</sup> unlawful / illegal search and seizure ] [ 3<sup>rd</sup> ] lab findings show actual possession by amount and location of bags found either way courts decide MR. MASSEY can not be charged with 1<sup>st</sup> degree with intent to manufacture and Delivery of a controlled substance [THAT'S IMPOSSIBALE ]

ORDER: 4

MR. MASSEY REQUEST 13,500 DOLLARS BACK FOR BONDS DUE TO ERRORS IN CHARGES

ORDER: 5

MR. MASSEY REQUEST 5,000 DOLLARS BACK IN ATTONEY FEES

ORDER: 6

MR MASSEY REQUEST punitive damages for (7) seven years wrongful conviction at due to evidence shows codefendant bonded out of jail to same address on search warrant so can not be a typo to different agencies under cause number 18-01-00375-CR

ORDER: 7

MR. MASSEY request a criminal investigation against MONTGOMERY COUNTY SURRVALLANCE TEAM .... MOTIVE IF MR. MASSEY was in jail insurance company would stop investigating the hit and run accident on DECEMBER 20<sup>TH</sup> 2017 totaling his company truck that could have killed Mr. Massey. MR. MASSEY sustained many major injuries, dislocated left shoulder, lower back, left knee, and multiple broken ribs.

On JANUARY 5<sup>TH</sup> 2018; MR. MASSEY was at company doctor at 8:15 am. I fired him and went to workmen's compensation lawyer at 11:15 am. Then to lawyers doctor at 1:30 pm in HOUSTON ,TEXAS ..... ONLY stopping at Mc Donalds in WILLIS ,TEXAS .where I picked up two people from

down the street that asked me for a ride home . We got pulled over in my driveway at 13289 PECAN TREE DR. They were released to go home at 13259 PECAN TREE DR. WE WRE PULLED OVER FOR AN ARREST WARRANT FOR UNKNOWN PERSON. The officer told me I could go to jail for harboring a fugitive and I was hiding this person, so I cussed him I went to jail for disorderly conduct .there is NO LAB FOR (1)BAG AT 4.16 GRAMS IN DRIVEWAY ONLY LAB IS FOR MULTIPLE BAGS FOUND ON A NIGHTSTAND IN MASTER BEDROOM AT 18:25 at another address .They can not live at my house and there house at same time; they boned out to there house not mine

ORDER 8: MR. MASSEY REQUEST CHANGE OF VENUE

ORDER 9: MR. MASSEY REQUEST ATTORNEY

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: MARCH, 2025

Signature of Plaintiff

Printed Name of Plaintiff

Steven Louis Massey Jr.

STEVEN LOUIS MASSEY JR

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address